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February 26, 2015

By ECF

Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

Re: Manning v. Griffin / 15 Civ. 003 (KMK)

Dear Judge Karas:

This Office represents the defendants in the above referenced matter. With consent of plaintiff's counsel, I write to respectfully request an extension of time, nunc pro tunc, by which defendants must answer or submit their pre-motion letter until March 25, 2015. Due to a misunderstanding, during a January 29, 2015 telephone conversation between the parties, regarding when service would be completed pursuant to Federal Rules of Civil Procedure, Rule 4(e) and New York CPLR § 308.2, this application was not made prior to today. Wherefore, it is respectfully requested that the Court grant defendants' application for an extension of time by which defendants must answer or submit their pre-motion letter, nunc pro tunc, until March 25, 2015.

Furthermore, I have assigned this action to Deputy Section Chief/Assistant Attorney General Maria B. Hartofilis, who will be filing a notice of appearance later today.

Respectfully submitted,
/s/ Rebecca Ann Durden
Rebecca Ann Durden

cc: Betsy Ginsberg, Esq.